

REMARKS

Claims 1-23 remain pending in the application.

Specification Objection

The Examiner alleges that the specification does not anticipate the claim feature of an encapsulation protocol.

Encapsulation has been deleted from the independent claims. However, new claims are added herein to recite the deleted language from the independent claims.

The Examiner is respectfully directed to the specification at page 31, lines 9-12 that discloses:

Each PG 116 can encapsulate the underlying wireless network access protocol so that it is transparent to MR 124 and BESs 122. As a result, when the MR 124 receives a message from a PG 116, it is unaware of the underlying network access protocol used for communicating the message.

The Examiner is respectfully directed to the specification at page 63, lines 17-24 that discloses:

In step 604, the simple network transport layer (SNTL) application can segment the message into multiple segments, can encapsulate the segments with an SNTL segment header 900, and can transmit the message initially to PG 116. An exemplary embodiment of a message header 900 is illustrated below with reference to FIG. 9. As will be apparent to those skilled in the relevant art, due to a high bit error rate in wireless communication links, it can be expected that not all transmissions to PG 116 will be received from the client device 112. From step 604, the flow diagram can continue with step 606.

As Applicants disclose, encapsulation adds a new message header to a message, with the original message header not being apparent to the router. The original message header is therefore transparent to the message router. The specification does disclose an encapsulated protocol that is transparent to a message router.

Moreover, the Examiner alleges that there is no indication in the specification about how a fundamental network protocol is different than any

selected wireless protocol. (see Office Action, page 2) The objected to language is herein removed from the claims, making the objection now moot.

The Applicants respectfully request that the objections to the specification be withdrawn.

35 USC 112 Rejection, First Paragraph of Claims 1-23

Claims 1-23 are rejected under 35 U.S.C. §112, first paragraph as allegedly failing to recite claimed features that are supported by the Applicants' specification. The claims are rejected for the same reasons as the specification was objected to above.

As discussed above, Applicants' specification supports the claimed encapsulated protocol that is transparent to a message router.

As discussed above, the rejected "fundamental network protocol" language has been removed from the claims, making the rejection now moot.

The Applicants respectfully request that the rejection of claims 1-23 under 35 U.S.C. §112, second paragraph be withdrawn.

35 USC 112 Rejection, Second Paragraph of Claim 2

Claim 2 is rejected under 35 U.S.C. §112, second paragraph as allegedly being unclear.

Claim 2 is amended herein to clarify the claimed features. The Applicants respectfully request that the rejection of claim 2 under 35 U.S.C. §112, second paragraph be withdrawn.

Claims 1, 2, 6, 7, 11-14, 18, 19, 22 and 23 over Ramasubramani and Callon, claims 3-5, 8-10, 15-17, 20 and 21 variously in further view of Barzegar, Boyle, Kung and Boyle2

In the Office Action, claims 1, 2, 6, 7, 11-14, 18, 19, 22 and 23 are rejected under 35 U.S.C. §103(a) as allegedly being obvious over U.S. Patent No. 6,507,589 to Ramasubramani et al. ("Ramasubramani") in view of U.S. Patent No. 5,251,205 to Callon et al. ("Callon"); claims 3-5 and 15-17 are rejected under 35 U.S.C. §103(a) as allegedly being obvious over

Ramasubramani, Callon, and further in view of U.S. Patent No. 5,894,478 to Barzegar et al. ("Barzegar"); claims 8 and 20 are rejected under 35 U.S.C. §103(a) as allegedly being obvious over Ramasubramani, Callon, and further in view of U.S. Patent No. 6,119,167 to Boyle et al. ("Boyle"); claim 9 is rejected under 35 U.S.C. §103(a) as allegedly being obvious over Ramasubramani, Callon, and further in view of U.S. Patent No. 6,826,173 to Kung et al. ("Kung"); and claims 10 and 21 were rejected under 35 U.S.C. §103(a) as allegedly being obvious over Ramasubramani, Callon, and further in view of U.S. Patent No. 6,138,158 to Boyle et al. ("Boyle2"). The Applicants respectfully traverse the rejections

Claims 1-23 recite, *inter alia*, registering at least one registered message router in a table, and managing a network connection with said at least one registered message router.

Ramasubramani appears to disclose techniques for routing messages to addressable portions within an apparatus. (see, Abstract) The techniques can be performed by a variety of apparatus including a gateway, a proxy server or a mobile device. (see Ramasubramani's Abstract) Processing of a message produces a message that forwards certain information from one or more remote computers on the network to a mobile device coupled to a wireless communication system. (see, Ramasubramani's Abstract)

Ramasubramani discloses a gateway and server for routing messages. Ramasubramani fails to disclose, teach or suggest registering at least one registered message router in a table, much less managing a network connection with said at least one registered message router, as recited by claims 1-23.

Callon appears to disclose a method for connecting a network so that TCP/IP and OSI 8473 packets may be routed in a same domain. (see Abstract) The Examiner relies on Callon to allegedly disclose encapsulation. (see Office Action, page 5) However, encapsulation has been deleted from the claims herein, as discussed above. Callon fails to disclose, teach or suggest registering a registered message router in a table, much less managing a

network connection with said at least one registered message router, as recited by claims 1-23.

Ramasubramani and Callon, either alone or in combination, fail to disclose, teach or suggest registering at least one registered message router in a table, and managing a network connection with said at least one registered message router, as recited by claims 1-23.

Barzegar, Boyle, Kung and Boyle2 are relied on to allegedly disclose various features of respective dependent claims. A thorough reading of Barzegar, Boyle, Kung and Boyle2 reveals that they also fail to disclose, teach or suggest registering at least one registered message router in a table, much less managing a network connection with said at least one registered message router, as recited by claims 1-23.

Accordingly, for at least all the above reasons, claims 1-23 are patentable over the prior art of record. It is therefore respectfully requested that the rejection be withdrawn.

Conclusion

All objections and rejections having been addressed, it is respectfully submitted that the subject application is in condition for allowance and a Notice to that effect is earnestly solicited.

Respectfully submitted,



William H. Bollman
Reg. No.: 36,457
Tel. (202) 261-1020
Fax. (202) 887-0336

MANELLI DENISON & SELTER PLLC
2000 M Street, N.W. 7th Floor
Washington D.C. 20036-3307
WHB/df